

Privacy Policy

The Privacy Policy (hereinafter referred to as the “**Policy**”) describe the way of collecting, using and subsequent dealing with personal data collected via both the *www.inwin.online* website (hereinafter referred to as the “**website**”) and the InWin mobile application available via both the Google Play Store and Apple’s App Store.

Personal data controller:

InWin Corporation., with registered office at Hoboken Riverfront Center - 9th floor, 221 River Street, Hoboken, NJ 07030, USA

Registration No 0450358254, registered with the New Jersey Department of the Treasury, Division of Revenue and Enterprise Services

Contact details:

Delivery address: Hoboken Riverfront Center - 9th floor, 221 River Street, Hoboken, NJ 07030, USA

Contact e-mail: compliance@inwin.online

Contact phone number: 732 77 11 657

Personal data protection is very important to us. Please acquaint with the Policy which contains important information regarding the usage of your personal data, related rights and obligations.

1. GENERAL PROVISIONS

1.1. What governs our relationship when dealing with personal data

Dealing with personal data is governed by the federal laws and regulations of the United States of America and those of the State of New jersey.

1.2. What personal data do we collect?

Personal data means any information relating to an identified or identifiable natural person. Personal data is particularly (but not exclusively):

- **Identification data**, such as the name and surname, username of an account;
- **Contact data**, such as e-mail address;
- **Other data**, such as information collected via cookies, IP address (network identifier) including the type of web browser, the device and operating system, duration and number of accesses to the website and corresponding information.

2. COLLECTING AND USING PERSONAL DATA

2.1. How do we collect your personal data?

You provide us with your personal data particularly by completing your registration within the website (or by filling a contact form). **Please inform us if there is any change of your personal data.**

Some personal data can be collected and saved via cookies during your visit on the website. You can read more about cookies in the Article 5 of the Policy.

2.2. On which basis and for which purposes do we process your personal data?

- We can collect and process information provided **within registration** and personal data necessary for providing our services without your explicit consent solely for the purpose of **performance of the contract**, which means for the purpose of permitting you **access, administration and management of your user account** and **providing our services**. We can further process the data in order to comply with our other **obligations imposed by law** (e. g. archiving of invoices etc.) and for the purpose of **protection of our legal claims**.
- We are entitled to use your e-mail address without your explicit consent for the purpose of sending commercial communications regarding our services similar to those we have provided to you. You can refuse sending of these commercial communications at any time.
- After your **consent** via confirmation on the website, we can process your personal data insert while ordering services or within registration in order to send the **commercial communications** and **direct marketing**, eventually for additional reasons to which you have explicitly consented.
- If we process personal data collected **via cookies**, we do so on the basis of your consent (which you give us in applicable Settings of your Internet browser) on the basis of our legitimate interest or for the purpose of a performance of the contract. We use data collected via cookies in particular for the purpose of user support, improving our services including analysis of user's behaviour and marketing.

We will ask for your consent before using data for a purpose other than those that are set out above.

2.3. For how long do we use the data?

We use the personal data insert by filling a contact form or within the registration on the website, solely for the time necessary to fulfil the contract and obligations imposed by law, respectively for protection of our legal claims.

If you give us explicit consent to process personal data or if we use your e-mail address for commercial communications, the data will be used for the time our website, on which we provide services similar to those we have already provided to, is functioning, eventually for the time stated in the consent.

3. YOUR RIGHTS IN RELATION TO PERSONAL DATA

3.1. Right to withdraw consent

If we process your personal data solely based on your consent (i.e. without any other legal purpose), you can decide to withdraw your consent at any time.

The withdrawal of consent to processing personal data is possible at any time:

- by sending an e-mail to our contact email address;
- in case of commercial communications – in a way which is indicated in every e-mail containing commercial communications (by clicking on deregistering link or by another way).

Withdrawal of consent does not affect the legality of personal data processing done before the withdrawal.

3.2. Right of access by the data subject

You have the right to be informed about processing of your data and eventually to access your personal data, in particular to get the following information:

- purpose of processing;
- category of processed personal data;
- recipient or category of recipients to whom will be the personal data accessible;
- time for which will be the personal data saved.

We will provide you with the copy of your personal data at your request. For further copies, we may request a reasonable compensation not exceeding necessary costs for providing the information about processing of your personal data.

3.3. Right to rectification

You have the right to request an imminent rectification of your incorrect or inaccurate data, i.e. rectification of incorrect data or/and complement of inaccurate data.

3.4. Right to object to processing

You have the right to object to processing of your processed personal data at any time, if we process these data for the purpose of direct marketing including any automatic process of your personal data. After the objection, we will stop processing your personal data for these purposes.

3.5. Right to erasure (“right to be forgotten“)

You have the right to request the erasure of your personal data if:

- the personal data are no long needed for purposes for which the data was collected or processed;
- you decided to withdraw the consent with processing;
- you objected to processing of the personal data;

- the personal data were processed illegally.

If there are no legal reasons for the refusal of erasure, we must comply with your request.

You can request to erase your personal data either via Contact Details as specified in the beginning of this Privacy Policy OR via the following URL:

<https://app.inwin.online/fe/main/user-data-deletion-request>

3.6. **Right to restriction of processing**

You have the right to request the restriction of processing of your personal data if:

- the accuracy of the data is contested;
- the processing is illegal, and you request the restriction of personal data instead of erasure;
- we no longer need your personal data for the purpose of processing, but you request these data for determining, execution or protection of your legal rights;
- you object to processing.

When the processing is restricted, we are only entitled to save your personal data; further processing is possible solely with your consent or for legal purposes.

If the processing of personal data is restricted for reason of your objection to processing, the restriction lasts for the time necessary to find, whether we are obliged to comply with the objection.

If the processing of personal data is restricted for reason of accuracy contestation of your personal data, the restriction lasts for the time of verification of the data accuracy.

3.7. **Right to data portability**

You have the right to collect the personal data you have provided us with, in the structured, commonly used and machine-readable format and to transmit these data to another personal data controller.

3.8. **How can you exercise your rights?**

You can exercise your rights in relation with personal data via our contact details. You will be provided with all the information and actions without undue delay.

When protecting your personal data, we will accommodate your needs as much as we can. However, if you are not satisfied with the arrangement, you have the right to contact relevant authorities which apply supervision of personal data protection.

4. **USAGE AND PROCESSING OF PERSONAL DATA**

4.1. **Who processes your personal data?**

We are the controller of your personal data in the meaning of the Regulation.

When necessary for performance of the contract or to comply our obligations, we can transfer your personal data to another subject, for example to persons involved in the

performance of the contract or in compliance with our obligations. We can delegate also other processors and recipients of personal data. At your request, we will inform you about concrete processor of your data.

Your personal data will not be transferred to a state outside of the European Union, unless it is necessary for the performance of the contract or for another reason which is in compliance with rules stipulated by the Regulation.

4.2. **How do we process personal data?**

Personal and other collected data are highly protected against any misuse. Personal data will be processed electronically in an automated manner.

5. **THE COOKIE FILES**

5.1. **What are cookies**

The cookie files or so called “**cookies**” are text files, saved in a computer or another electronic device of every visitor of the website, which allow an analysis of a manner of using the website.

Not all cookies collect your personal data; some of them only enable correct operation of the website. You can refuse using cookies in applicable Settings of your Internet browser.

When refusing cookies, it might happen that you will not be able to fully use all the functions of the website.

5.2. **Which cookies the website uses**

The website uses **relational (temporary) cookies** which are automatically erased after the leaving of the website. Furthermore, it may use **permanent cookies**, which remain in your device until they expire or you delete it.

The website may use:

- **first party cookies** – these cookies are assigned to the domain of our website; these are necessary cookies and performance cookies, which we use even before conclusion of the contract for the purpose of performance of the contract, on the basis of our legitimate interests or on the basis of your consent. They can be temporary or permanent.
 - **session cookies** – allow navigation on the website and the use of basic functions, these cookies do not collect personal data, i.e. they usually do not identify you;
 - **analytical cookies** – serve for analysis of the way of using website (the number of visits, duration of time spent on the website etc.), the data collected by these cookies are anonymous;

The Privacy Policy is valid and effective as of December 5th, 2024